

1 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,
2 U.C.C.1-103.6, U.C.C.3-415, Natural Person IN FULL LIFE, SUI JURIS
3 IN PROPRIA PERSONA
4 4244 HILDRETH ST. SE.
5 WASHINGTON, DC, [20019-9998]
6 1-202-706-8063

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF MARYLAND

9 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,
10 U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA

11 Plaintiff, Claimant

12 VS.

CIVIL ACTION No.

13 JFM 12 CV 3444

14
15 CEO - SCOTT MATTE
16 D/B/A - RJM ACQUISITIONS, LLC
17 575 Underhill Blvd. Suite 224
18 Syosset, NY 11791

COMPLAINT

19 Defendant, Respondent
20

21 PRELIMINARY STATEMENT

22 1. This is an action for damages brought from violations of the Fair Credit Reporting Act
23 (FCRA) Title15 U.S.C. §1681 *et seq.*

24 JURISDICTION

25 2. The jurisdiction of this Court is conferred by Title15 U.S.C. §1681p.

26
27 FACTUAL ALLEGATION

28 3. On DECEMBER 9, 2011, and January 9, 2012 Defendant initiated a soft pull of Plaintiff's
credit report from TRANSUNION without permissible purpose.

COUNT I

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C.§1681
WILLFUL NON-COMPLIANCE BY DEFENDANT RJM ACQUISITIONS, LLC
(DEBT COLLECTOR)**

3. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C.§1681a(c).

4. RJM ACQUISITIONS, LLC (DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C. §1681s-2.

5. RJM ACQUISITIONS, LLC (DEBT COLLECTOR), willfully violated the FCRA.

Defendant's Violations include, but are not limited to, the following:

(a) RJM ACQUISITIONS, LLC (DEBT COLLECTOR), willfully violated Title15 U.S.C.§1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 a Month from the date of credit pull against consumer credit report. RJM ACQUISITIONS, LLC (DEBT COLLECTOR), are liable for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title15 U.S.C. §1681n.

COUNT II

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C. §1681
NEGLIGENT NON-COMPLIANCE BY DEFENDANT RJM ACQUISITIONS, LLC
(DEBT COLLECTOR),**

6. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C. §1681a(c).

7. RJM ACQUISITIONS, LLC (DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C.§1681s-2.

8. RJM ACQUISITIONS, LLC (DEBT COLLECTOR), negligently violated the FCRA.

Defendant's violations include, but are not limited to, the following:

(a) RJM ACQUISITIONS, LLC (DEBT COLLECTOR) negligently violated 15 U.S.C. §1681b (f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 Month from the date of credit pull against consumer credit report, RJM ACQUISITIONS, LLC (DEBT COLLECTOR) are liable for actual damages, and attorney's fees and costs, pursuant to Title 15 U.S.C. § 1681o.

RELIEF

WHEREFORE, Plaintiff demands judgment for damages against, RJM ACQUISITIONS, LLC (DEBT COLLECTOR) in the amount \$14,000 for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title 15 U.S.C. §1681n (a) (3) and Title 15 U.S.C. §1681o (a)

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues as a matter of law.

Respectfully submitted this 21th day of November, 2012

x  

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